

# **HOLY-LAND MARKETING PRIVATE LIMITED**

## **Corporate Social Responsibility (CSR) Policy**

**(Effective and Adopted with effect from 10.01.2018, Last Reviewed on 31.10.2023)**



### **1. Concept**

Corporate Social Responsibility is strongly connected with the principles of Sustainability; an organization should make decisions based not only on financial factors, but also considering the social and environmental consequences. As a Corporate Citizen receiving various benefits out of society, it is our co-extensive responsibility to pay back in return to the society in terms of helping needy people by providing foods, clothes, etc., keeping the environment clean and safe for the society by adhering to the best industrial practices and adopting best technologies, and so on. It is the Company's intent to make a positive contribution to the society in which the Company operates.

### **2. Short Title & Applicability**

This policy, which encompasses the company's philosophy for delineating its responsibility as a corporate citizen and lays down the guidelines and mechanism for undertaking socially useful programmes for welfare & sustainable development of the community at large, is titled as the "**HOLY-LAND MARKETING PRIVATE LIMITED**". It has been prepared keeping in mind the Company's code of business ethics and to comply with the requirements of Companies Act, 2013 (hereinafter called as "the Act") and the Companies (Corporate Social Responsibility Policy) Rules, 2014, notified by the Ministry of Corporate Affairs vide Notification dated 27th February, 2014. This policy shall apply to all CSR initiatives and activities taken up at the various work- centres and locations of the Company, for the benefit of different segments of the society, specifically the deprived, under-privileged and differently abled persons.

### **3. Policy Objective**

Corporate Social Responsibility is a form of corporate self-regulation integrated into a business model. Therefore, the Policy will function as a built-in, self-regulating mechanism whereby the business will monitor and ensure its active compliance with the spirit of law, ethical standards and international norms. The main objective of this Policy is to set a guiding principle for carrying out CSR activities by the Company and to set up process of execution, implementation and monitoring of the CSR activities to be undertaken by the Company.

### **4. CSR Committee**

In accordance with the provision of the Companies Act, 2013, the Company currently is not required to constitute CSR Committee, as the amount to be spent by a company does not exceed Rs. 50 lakh, and thus the CSR committee constituted previously stands dissolved. The functions of such Committee shall be discharged by the Board of Directors of the Company.

### **5. List of Activities/Projects**

The Company shall undertake any of the following Activities/Projects or such other activities/projects as may be notified by the Ministry of Corporate Affairs from time to time as a part of the Corporate Social Responsibility ("CSR"):

- i.** Eradicating hunger, poverty and malnutrition, promoting preventive health care and sanitation and making available safe drinking water,
- ii.** Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly and the differently abled and livelihood enhancement projects;
- iii.** Promoting gender equality, empowering women, setting up homes and hostels for women and orphans, setting up old age homes, day care centres and such other facilities for senior citizens and measures for reducing inequalities faced by socially and economically backward groups;
- iv.** Ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agroforestry, conservation of natural resources and maintaining quality of soil, air and water;
- v.** Protection of national heritage, art and culture including restoration of buildings and sites of historical importance and works of art; setting up public libraries;
- vi.** promotion and development of traditional arts and handicrafts;
- vii.** Measures for the benefit of armed forces veterans, war widows and their dependents;
- viii.** Training to promote rural sports, nationally recognised sports, Paralympic and Olympic sports;
- ix.** Contribution to the Prime Minister's National Relief Fund or any other fund set up by the central government for socio-economic development and relief and welfare of the scheduled castes, the scheduled tribes, other backward classes, minorities and

- women;
- x. Contribution or funds provided to technology incubators located within academic institution which are approved by the Central Government;
  - xi. Rural development projects;
  - xii. Any other activities in relation of the above and all other activities which forms part of CSR as per Schedule VII of the Act, 2013 (the "Act") as amended from time to time. (Collectively hereinafter referred to as "CSR Activities") The CSR Activities shall be undertaken only in India for the benefit of the public and not only for the employees of the Company and their family. Provided that the preference shall be given to the local areas and areas where the Company operates for undertaking the CSR Activities.

## **6. Quantum of Amount to be spent on CSR Activities**

- i. For achieving its CSR objectives through implementation of meaningful & sustainable CSR programs, the Company will allocate 2% of its average net profits made during the preceding three financial years as its Annual CSR Budget.
- ii. The Annual CSR Budget shall be spent on activities laid down in this Policy.
- iii. Any surplus arising and/or additional revenue generated out of CSR Activities undertaken by the Company shall not form part of the business profit of the Company and same shall be spent for undertaking any CSR Activities only.

## **7. Implementation of CSR Activities**

- i. The Company may undertake CSR Activities through a registered trust or society or any company, established by the Company, its holding or subsidiary Company under Section 8 of the Act for such non-for-profit objectives.
- ii. The Company may collaborate with other companies for undertaking the CSR Activities subject to fulfilment of separate reporting requirements as prescribed in the Companies (Corporate Social Responsibility Policy) Rules, 2014 (the "Rules").
- iii. The scope of this policy will extend to activities as stated under Schedule VII of the Companies Act, 2013, as presently in force. The scope of the policy to also include all additional and allied matters, as will be notified by Ministry of Corporate Affairs or such other body, as appointed / notified by Central or State Government, from time to time for this purpose.
- iv. If the Company fails to spend, the amount stated hereinabove, then reason for not spending shall be stated in the Directors Report.
- v. CSR programmes will be undertaken by various work centres i.e. Corporate office, units and other business places of the Company in India to the best possible extent within the defined ambit of the identified Project/ Program.
- vi. The time period/duration over which a particular programme will be spread, will depend on its nature, extent of coverage and the intended impact of the programme.
- vii. The process for implementation of CSR programmes will involve the following steps :

**Identification of programme** will be done by means of the following:

- a) Need identification Studies by the Senior Management/professional institutions/agencies.

- b) Internal need assessment by cross-functional team at the local level.
- c) Receipt of proposals/requests from District Administration/local Govt. etc.
- d) Suggestions from the Board of Directors/senior management level.

## **8. Procedure for CSR Activities**

The Board of Directors shall:

1. formulate and approve the CSR Policy and indicate CSR activities to be undertaken;
2. approve the amount of expenses to be incurred in each CSR activity / project / program in a financial year;
3. Identify and approve any CSR project as "Ongoing Project" if it is a multi-year project undertaken by a Company in fulfilment of its CSR obligation having timelines not exceeding 3 years excluding the financial year in which it was commenced. If the project is initially not approved as a multiyear project; it can still be considered as Ongoing Project if duration of the Project has been extended beyond one year by the Board based on reasonable justification; and
4. monitor the CSR policy and CSR activities on a periodic basis.

The Board will assign task of implementation of the CSR Policy within the stipulated budgets and timeframes to such person and bodies as it deems fit in pursuance to the provisions of the Act. The Board may invite employees and may also use services of others or external experts for guiding the CSR activities and ensuring adherence to this policy document.

## **9. Exclusions:**

- i. The CSR Activities shall not include any activity undertaken by the Company in pursuance of normal course of business of the Company.
- ii. The Company shall not make any payment directly or indirectly to Political Party(ies) for CSR Activities.
- iii. The CSR projects or programs or activities that benefit only the employees of the company and their families shall not be considered as CSR activities in accordance with section 135 of the Act.
- iv. Any surplus arising out of the CSR projects or programs or activities shall not form part of the business profit of the company but should be added in the CSR Fund

## **10. Allied Matters**

- i. With regard to CSR activities, Board Report to state such particulars as stated under Companies (Corporate Social Responsibility) Rules, 2014.
- ii. The Company shall display such particulars relating to CSR Policy and activities undertaken there under as stated under Companies (Corporate Social Responsibility) Rules, 2014.

## **11. MONITORING AND FEEDBACK**

1. The Board shall have a transparent monitoring mechanism for implementation of CSR projects undertaken, utilization of funds donated and shall ensure end use of funds for the purpose for which they are sanctioned.
2. A detailed account of all expenditure (direct and indirect) including contribution to corpus for projects or programs relating to CSR activities approved by the Board and as per CSR policy will be presented to the Board on a half yearly basis.
3. The management will also present periodical report to the Board on the utilization of CSR money sanctioned, and other CSR related matters during the year.
4. Any surplus arising out of CSR projects /programs / activities shall not form part of the business profit of the Company and will be redeployed for CSR activities or shall be transferred to the Unspent Corporate Social Responsibility Account and spent in the manner approved or to a Fund prescribed under the provisions of the Act.
5. The Chief Financial Officer of the Company or person responsible for financial management shall ensure and certify that the funds are utilized as approved by the Board.
6. In case of ongoing project, the Board of a Company shall monitor the implementation of the project with reference to the approved timelines and year-wise allocation and shall be competent to make modifications, if any, for smooth implementation of the project within the overall permissible time period.
7. An annual report outlining the CSR activities/projects and details of monetary contributions including set off/ unspent amount. The Board shall also give a responsibility statement that the implementation and monitoring of the CSR policy is in compliance with the CSR objectives and the policy of the Company.
8. The Directors' Report shall include an annual report on CSR activities providing the prescribed details.

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